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Public Meeting – Detection and Avoidance of Counterfeit Electronic Parts – Further Implementation

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DFARS 2102-D055 Changes

- Definitions
- Commercial items application
- Flowdown clauses
- Trusted Suppliers

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Further Implementation Questions

- How can a vendor determine a “trusted supplier” in the case of sourcing an obsolete part?
- What metrics will be used to determine whether or not a vendor’s “risk-based analysis” is sufficient?
- What access to suppliers and technologies will the Department lose because of the applicability to commercial items?

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Continued Dialogue

- The DoD must determine a method for continuing to converse with industry stakeholders even though the rule is final
- Risk-based approaches continue to be the most effective way to detect and avoid counterfeits and supply chain threats

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